

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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JOSE GUITERREZ, JUAN MONTENEGRO, NOEL  
BAQUEDANO, WILLIAN RODRIGUEZ, ANGEL  
RODRIGUEZ and HAROLD VENTURA, on behalf of  
Themselves and other similarly situated,

Plaintiffs,

**Case No. 19-cv-04524  
(KAM)(PK)**

**NOTICE OF MOTION TO  
WITHDRAWN AS COUNSEL  
FOR THE DEFENDANTS**

-against-

DAVINCI'S RESTAURANT & LOUNGE, CHRISTINA  
A. 1/n/a, CHRISTINA 1/n/u, JOSE BONILLA, and  
JOHN/JANE DOES 1-10,

Defendants.

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**NOTICE OF MOTION TO BE RELIEVED AS COUNSEL OF  
RECORD FOR DEFENDANTS IN THIS ACTION**

**PLEASE TAKE NOTICE THAT,** that upon the annexed Declaration of Stephen D. Hans, dated November 25, 2021, and upon all pleadings and prior proceedings had herein, Stephen D. Hans & Associates, P.C. hereby moves this Court, before the Honorable Kathleen Tomlinson, United States District Magistrate Judge for the Eastern District of New York, at the courthouse located at 100 Federal Plaza, Central Islip, NY 11722 at a date and time to be determined by the Court, for an Order: (i) pursuant to Local Rule 1.4 and Rule 1.16 of the New York Rules of Professional Conduct permitting Stephen D. Hans & Associates, P.C. to withdraw as counsel for record for Defendant **CHRISTINA BOUZALAS** in the above referenced action; (ii) granting Defendants thirty (30 days from the date a decision is

rendered on this motion to retain new counsel in the above-referenced action; and (iii) awarding such other and further relief as the Court deems just and proper.

Dated: Long Island City, New York  
October 25, 2021

STEPHEN D. HANS & ASSOCIATES, P.C.

: /s/Stephen D. Hans

Stephen D. Hans (SH-0798)  
30-30 Northern Boulevard, Suite 401  
Long Island City, New York 11101  
Tel: 718.275.6700 x 204

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that on October 25, 2021, I caused a true and correct copy of the foregoing Notice of Motion and Declaration of Counsel with exhibits to be electronically filed with the Clerk of the District Court using the CM/ECF system. which sent notification of such filing and an electronic copy thereof to:

Marcus Monteiro, Esq.  
Monteiro & Fishman LLP.  
91 N Franklin Suite, Suite 108  
Hempstead, NY 11550  
Tel: 516-280-4600  
Email: [mmonteiro@mflawny.com](mailto:mmonteiro@mflawny.com)  
*Attorneys for the Plaintiffs*

The undersigned attorney also hereby certifies that on October 25, 2021, I served a true and correct copy of the foregoing Notice of Motion and Declaration of Counsel with exhibits upon Defendants; **CHRISTINA BOUZALAS** emailed to the following email: [cbouzas18@gmail.com](mailto:cbouzas18@gmail.com)

**/s/Stephen Hans**

Stephen D. Hans